

Corrective Action Management Unit (CAMU)

- 1. Is any of the waste placed in the CAMU classified as listed hazardous waste?**

Background: Based on the Buckeye's review of the CAMU Application, the HSWA Permit, and other site documents including the 1994 Description of Current Conditions and the 2008 Corrective Measures Study, the remediation waste placed in the CAMU includes waste that is characteristically hazardous for lead and soil contaminated with benzo(a)pyrene, but not listed hazardous waste. Buckeye is seeking confirmation that the CAMU does not contain listed hazardous waste and requests that EPA and NJDEP provide their interpretation.

- 2. If the CAMU did receive listed hazardous waste, would the leachate from the CAMU be classified as F039 waste?**

Background: See description of F039 waste code below. Buckeye's interpretation is that the F039 listing would not apply because placement of wastes in a CAMU does not constitute land disposal under RCRA per 40 CFR 264.552(a)(4).

F039	Leachate (liquids that have percolated through land disposed wastes) resulting from the disposal of more than one restricted waste classified as hazardous under subpart D of this part. (Leachate resulting from the disposal of one or more of the following EPA Hazardous Wastes and no other Hazardous Wastes retains its EPA Hazardous Waste Number(s): F020, F021, F022, F026, F027, and/or F028.)
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- 3. If the CAMU did receive listed hazardous waste, would the leachate from the CAMU be classified as a listed hazardous waste pursuant to the derived-from rule [40 CFR 261.3(c)(2)(1)]?**

Background: This rule states that wastes "generated from the treatment, storage or disposal" of a listed hazardous waste will continue to be regulated as that listed waste code (F, K, P or U). The exception is for listed wastes that are listed solely based on the characteristics of ignitability, corrosivity or reactivity (but not toxicity) that no longer exhibit these characteristics. If any of the refinery waste codes (F037, F038, K051 and K052) are applicable, this exemption would not apply as those wastes are listed on the basis of toxicity.

- 4. If the answer to Question 2 or 3 is yes, then would the contained-in policy apply to the leachate if it can be demonstrated through sampling and analysis that this environmental media does not contain the listed hazardous waste or underlying hazardous constituents at levels that pose a risk to human health or the environment?**

Background: EPA has not issued guidelines as to when or at what levels environmental media contaminated with listed hazardous wastes are no longer considered to contain those hazardous wastes. These levels generally are determined by the EPA Region or authorized state agency on a site-specific basis. Buckeye would like to understand if EPA and NJDEP agree this policy would apply to the CAMU leachate and what would be the criteria used for comparison with the leachate data. The leachate monitoring data provided with the Updated Leachate and Groundwater Monitoring Plan (LGMP) for Cells 1 through 3 (June 2017) indicate very low levels of hazardous constituents; most are not detected. A copy of the data from that plan is provided in Attachment 1.

North Field Basin/Surge Pond (NFB/SP)

- 1. Would the groundwater that is pumped from within the barrier wall surrounding the SP be classified as F039 waste?**

Background: The NFB was part of the facility's stormwater run-off management system. This impoundment was used to store excess stormwater when the hydraulic capacity of the effluent treatment plant was exceeded. The SP was used for storage of refinery materials, including listed hazardous wastes (refinery waste codes F037, F038, K051 and K052). The NFB/SP was remediated as documented in the March 2005 Closure Certification Report. The residual material and impacted soil from both basins were treated, solidified, excavated and consolidated in the SP. A low permeability barrier wall and cap were constructed around and atop the SP and an extraction system installed to pump groundwater from within the area. See Question 2 under CAMU above for the F039 waste code description. This area has not been designated a CAMU.

- 2. Would the groundwater that is pumped from within the barrier wall surrounding the SP be classified as a listed hazardous waste pursuant to the derived-from rule [40 CFR 261.3(c)(2)(1)]?**

Background: As noted under Question 1, some of the material placed in the SP was listed hazardous waste associated with one or more of the refinery waste codes (F037, F038, K051 and K052). This rule states that wastes "generated from the treatment, storage or disposal" of a listed hazardous waste will continue to be regulated as that listed waste code (F, K, P or U). The exception is for listed wastes that are listed solely based on the characteristics of ignitability, corrosivity or reactivity (but not toxicity) that no longer exhibit these characteristics. The

refinery waste codes are listed on the basis of toxicity so this exemption would not apply.

- 3. If the answer to Question 1 or 2 is yes, then would the contained-in policy apply to the groundwater if it can be demonstrated through sampling and analysis that this environmental media does not contain the listed hazardous waste or underlying hazardous constituents at levels that pose a risk to human health or the environment?**

Background: EPA has not issued guidelines as to when or at what levels environmental media contaminated with listed hazardous wastes are no longer considered to contain those hazardous wastes. These levels generally are determined by the EPA Region or authorized state agency on a site-specific basis. Buckeye would like to understand if EPA and NJDEP agree this policy would apply to the groundwater that is pumped from within the barrier wall surrounding the surge pond and what would be the criteria used for comparison with the groundwater monitoring data. The groundwater monitoring data for the five extraction wells provided with the Biennial Certification for Soil and Ground Water Remedial Action Permits – Surge Pond SWMU (December 2017) indicate low levels of hazardous constituents (benzene, phenol, arsenic and lead). A copy of the data from that report is provided in Attachment 2.

ATTACHMENT 1
CAMU LEACHATE DATA

**Excerpt from Updated Leak Detection Monitoring Program (LDMP) and
Updated Leachate and Groundwater Monitoring Plan (LGMP) for CAMU Cells 1
through 3 Former Chevron Perth Amboy Facility in New Jersey - June 2017**

Volatile Organic Compound Results for Leachate Samples

Cell 1 Operations (Q4 2015 – Q1 2017)

Updated LDMP and LGMP for Cell 1-3

Former Chevron Perth Amboy Facility in New Jersey

Field Sample ID	CS-WW-2015Q4-LGMP	CS-WW-2016Q1-LGMP	CS-WW-2016Q2-LGMP	CS-WW-2016Q3-LGMP	CS-WW-2016Q4-LGMP	CS-WW-2017Q1-LGMP
Sample Date	12/16/2015	03/14/2016	06/06/2016	09/12/2016	12/05/2016	03/02/2017
Parameter Name/Report Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
1,1-Dichloroethene	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
1,1,1-Trichloroethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
1,1,2,2-Tetrachloroethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
1,1,2-Trichloroethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
1,1,2-Trichlorotrifluoroethane (Freon 113)	2UJ	2UJ	2U	2UJ	2U	20U
1,1-Dichloroethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
1,2,4-Trichlorobenzene	1UJ	1UJ	1U	1UJ	1U	10U
1,2-Dibromo-3-chloropropane (DBCP)	2UJ	2UJ	2U	2UJ	2U	20U
1,2-Dibromoethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
1,2-Dichlorobenzene (o-Dichlorobenzene)	1UJ	1UJ	1U	1UJ	1U	10U
1,2-Dichloroethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
1,2-Dichloropropane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
1,3-Dichlorobenzene	1UJ	1UJ	1U	1UJ	1U	10U
1,4-Dichlorobenzene	1UJ	1UJ	1U	1UJ	1U	10U
2-Butanone (Methyl ethyl ketone)	3UJ	3UJ	3U	5J-	3U	30U
2-Hexanone	3UJ	3UJ	3U	3UJ	3U	30U
4-Methyl-2-pentanone	3UJ	3UJ	3U	3UJ	3U	30U
Acetone	6UJ	6UJ	6U	25J-	6U	60U
Benzene	0.5UJ	0.5UJ	0.5U	1J-	0.5U	5U
Bromodichloromethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Bromoform	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Bromomethane (Methyl bromide)	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Carbon disulfide	1UJ	1UJ	1U	1UJ	1U	10U
Carbon Tetrachloride	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Chlorobenzene	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Chloroethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Chloroform	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Chloromethane (Methyl chloride)	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
cis-1,2-Dichloroethene	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
cis-1,3-Dichloropropene	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Cyclohexane	2UJ	2UJ	2U	2UJ	2U	20U
Dibromochloromethane	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Dichlorodifluoromethane (Freon 12)	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Ethylbenzene	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Isopropylbenzene	1UJ	1UJ	1U	1UJ	1U	10U
Methyl acetate	1UJ	1UJ	1U	1UJ	1U	10U
Methyl-t-butyl ether	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Methylcyclohexane	1UJ	1UJ	1U	1UJ	1U	10U
Methylene chloride (Dichloromethane)	2UJ	2UJ	2U	2UJ	2U	20U
Styrene	1UJ	1UJ	1U	1UJ	1U	10U
Tetrachloroethene	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Toluene	0.5UJ	0.5UJ	0.5U	0.8J-	0.5U	5U
trans-1,2-Dichloroethene	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
trans-1,3-Dichloropropene	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Trichloroethene (Trichloroethylene)	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Trichlorofluoromethane (Freon 11)	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Vinyl chloride (Chloroethene)	0.5UJ	0.5UJ	0.5U	0.5UJ	0.5U	5U
Xylene (total)	0.5UJ	0.5UJ	0.6J	0.9J-	0.5U	5U

Notes:

U- Analyte not detected at that concentration

UJ- Analyte not detected above the approximate reported sample

J- - Analyte concentration biased low

Semi Volatile Organic Compound Results for Leachate Samples
Cell 1 Operations (Q4 2015 – Q1 2017)
 Updated LDMP and LGMP for Cell 1-3
 Former Chevron Perth Amboy Facility in New Jersey

Field Sample ID	CS-WW-2015Q4-LGMP	CS-WW-2016Q1-LGMP	CS-WW-2016Q2-LGMP	CS-WW-2016Q3-LGMP	CS-WW-2016Q4-LGMP	CS-WW-2017Q1-LGMP
Sample Date	12/16/2015	03/14/2016	06/06/2016	09/12/2016	12/05/2016	03/02/2017
Parameter Name/Report Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
2,4,5-Trichlorophenol	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
2,4,6-Trichlorophenol	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
2,4-Dichlorophenol	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
2,4-Dimethylphenol	0.5U	0.5UJ	3	24J-	0.5UJ	0.5U
2,4-Dinitrophenol	10U	10UJ	10U	10UJ	10UJ	10U
2,4-Dinitrotoluene	1U	1UJ	1U	1UJ	1UJ	1U
2,6-Dinitrotoluene	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
2-Chloronaphthalene	0.4U	0.4UJ	0.4U	0.4UJ	0.4UJ	0.4U
2-Chlorophenol (o-Chlorophenol)	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
2-Methyl-Naphthalene	0.1J	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
2-Methylphenol (o-Cresol)	0.5U	0.5UJ	0.7J	60J-	0.5UJ	0.5U
2-Nitroaniline (o-Nitroaniline)	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
2-Nitrophenol (o-Nitrophenol)	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
3,3'-Dichlorobenzidine	2U	2UJ	2U	2UJ	2UJ	2U
3-Nitroaniline	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
4,6-Dinitro-2-methylphenol (4,6-Dinitro-o-cresol)	5U	5UJ	5U	5UJ	5UJ	5U
4-Bromophenylphenoxyether	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
4-Chloroaniline	2U	2UJ	2U	2UJ	2UJ	2U
4-Chlorophenyl phenyl ether	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
4-Methylphenol (p-Cresol)	0.5U	0.5UJ	2	48J-	0.5UJ	0.5U
4-Nitroaniline	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
4-Nitrophenol	10U	10UJ	10U	10UJ	10UJ	10U
Acenaphthene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Acenaphthylene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Acetophenone	0.5U	0.5UJ	1	2J-	0.5UJ	0.5U
Anthracene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Atrazine	2U	2UJ	2U	2UJ	2UJ	2U
Benzaldehyde	1U	1UJ	1U	1UJ	1UJ	1U
Benzo(a)anthracene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Benzo(a)pyrene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Benzo(b)fluoranthene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Benzo(g,h,i)perylene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Benzo(k)fluoranthene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
bis(2-Chloroethoxy)methane	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
bis(2-Chloroethyl) ether	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
bis(2-chloroisopropyl) ether	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
bis(2-Ethylhexyl)phthalate	2U	2UJ	2U	2UJ	2UJ	2U
Butylbenzylphthalate	2U	2UJ	2U	2UJ	2UJ	2U
Caprolactam	5U	5UJ	5U	5UJ	5UJ	5U
Carbazole	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
Chrysene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Di-n-butylphthalate	2U	2UJ	2U	2UJ	2UJ	2U
Di-n-octylphthalate	2U	2UJ	2U	2UJ	2UJ	2U
Dibenz(a,h)anthracene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Dibenzofuran	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
Diethylphthalate	2U	2UJ	2U	2UJ	2UJ	2U
Dimethyl phthalate	2U	2UJ	2U	2UJ	2UJ	2U
Diphenyl (Biphenyl, Phenyl benzene)	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
Fluoranthene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Fluorene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Hexachlorobenzene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Hexachlorobutadiene	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
Hexachlorocyclopentadiene	5U	5UJ	5U	5UJ	5UJ	5U
Hexachloroethane	1U	1UJ	1U	1UJ	1UJ	1U
Indeno(1,2,3-cd)Pyrene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Isophorone	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
N-Nitrosodi-n-propylamine	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
N-Nitrosodiphenylamine (Diphenylamine)	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
Naphthalene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Nitrobenzene	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
p-Chloro-m-cresol	0.5U	0.5UJ	0.5U	0.5UJ	0.5UJ	0.5U
Pentachlorophenol	1U	1UJ	1U	1UJ	1UJ	1U
Phenanthrene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U
Phenol	0.5U	0.5UJ	0.5U	4J-	0.5UJ	0.5U
Pyrene	0.1U	0.1UJ	0.1U	0.1UJ	0.1UJ	0.1U

Notes:

U- Analyte not detected at that concentration

UJ- Analyte not detected above the approximate reported sample

J- Analyte concentration biased low

TAL Metals Results for Leachate Samples
Cell 1 Operations (Q4 2015 – Q1 2017)
 Updated LDMP and LGMP for Cell 1-3
 Former Chevron Perth Amboy Facility in New Jersey

Field Sample ID	CS-WW-2015Q4-LGMP	CS-WW-2016Q1-LGMP	CS-WW-2016Q2-LGMP	CS-WW-2016Q3-LGMP	CS-WW-2016Q4-LGMP	CS-WW-2017Q1-LGMP
Sample Date	12/16/2015	03/14/2016	06/06/2016	09/12/2016	12/05/2016	03/02/2017
Parameter Name/Report Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Aluminum	84.1U	92.9UJ	92.9U	123J-	91.9J	99.1J
Antimony	1.5	4.7J-	10.0	3.4J-	9.4	11.1
Arsenic	1.1J	2.7J-	10.1	13.4J-	6.1	6.8
Barium	50.3	86.0J-	67.7	89.1J-	58.7	44
Beryllium	0.70U	1.1UJ	1.1U	0.67UJ	1.3UJ	0.67U
Cadmium	0.30U	0.64UJ	0.64U	0.49UJ	0.49U	0.49U
Calcium	171000	263000J-	165000	280000J-	251000	179000
Chromium	2.2J	8.2UJ	7.6J	5.2J-	3UJ	1.8U
Cobalt	0.90U	1.8J-	8.6	2.4J-	4.1J	1.9U
Copper	7.4J	61.5J-	15.4	25.3J-	15.4	59.5
Iron	33.3U	64.8J-	847	2130J-	501	212
Lead	1.3	3.7J-	15.0	4.9J-	2.7	5.3
Magnesium	51000	117000J-	87900J	265000J-	315000	465000
Manganese	1.7J	818J-	1910	3760J-	1680	87.4
Mercury	0.050U	0.050UJ	0.050U	0.05UJ	0.05U	0.050U
Nickel	2.3J	22.9J-	30.1	11.9J-	12.3	13.5
Potassium	9490	20700J-	17400J	27100J-	21900	21900
Selenium	8.2U	8.2UJ	9.7U	9.7UJ	15.3J	9.7U
Silver	1.4U	1.8UJ	1.8U	1.9UJ	1.9U	1.9U
Sodium	56400	542000J-	309000J	699000J-	366000J	477000
Thallium	0.15U	0.15UJ	0.15U	0.16UJ	0.16U	0.16U
Vanadium	1.4U	43.3J-	15.9	29.6J-	13.7	43.3
Zinc	28.7	135J-	66.1	22.9J-	45.5	20.3

Notes:

U- Analyte not detected at that concentration

UJ- Analyte not detected above the approximate reported sample

J- Analyte concentration estimated

J - Analyte concentration biased low

Ammonia Nitrogen for Leachate Samples

Cell 1 Operations (Q4 2015 – Q1 2017)

Updated LDMP and LGMP for Cell 1-3

Former Chevron Perth Amboy Facility in New Jersey

Field Sample ID	CS-WW-2015Q4-LGMP	CS-WW-2016Q1-LGMP	CS-WW-2016Q2-LGMP	CS-WW-2016Q3-LGMP
Sample Date	12/16/2015	03/14/2016	06/06/2016	09/12/2016
Parameter Name/Report Units	ug/L	ug/L	ug/L	ug/L
Ammonia Nitrogen As N	200U	200UJ	280J	480J-

Field Sample ID	CS-WW-2016Q4-LGMP	CS-WW-2017Q1-LGMP
Sample Date	12/05/2016	03/02/2017
Parameter Name/Report Units	ug/L	ug/L
Ammonia Nitrogen As N	280J	200U

Notes:

U- Analyte not detected at that concentration

UJ- Analyte not detected above the approximate reported

J- Analyte concentration estimated

J- - Analyte concentration biased low

Field Parameters for Leachate Samples

Cell 1 Operations (Q4 2015 – Q1 2017)

Updated LDMP and LGMP for Cell 1-3

Former Chevron Perth Amboy Facility

Parameter/Sampling Event	Unit	12/16/2015	3/14/2016	6/6/2016	9/12/2016	12/4/2016	3/2/2017
pH	SU	7.22	7.12	7.34	7.07	7.47	7.79
Dissolved Oxygen	mg/l	7.99	6.73	5.2	4.31	4.25	7.14

ATTACHMENT 2
SURGE POND EXTRACTION WELLS MONITORING DATA

**Excerpt from Biennial Certification for Soil and Ground Water Remedial Action
Permits; Surge Pond SWMU – December 2017**

Table I
Attachment 6 - Biennial Certification Surge Pond SWMU
Effluent Treatment Plant Analytical Results
Former Chevron USA Inc. Perth Amboy Facility - NJDEP PI No. 003621
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Parameter (ppb)	2015 Results			2016 Results			2017 Results		
	Quarter:	4Q2015	1Q2016	2Q2016	3Q2016	4Q2016	1Q2017	2Q2017	3Q2017
	Date Sampled:	11/12/15	02/25/16	05/19/16	08/25/16	11/03/16	03/23/17	05/11/17	09/28/17
Laboratory:	Lancaster	Lancaster	Lancaster	Lancaster	Lancaster	Lancaster	Lancaster	Lancaster	Lancaster
Ammonia	10,000	8,300	8,000	13,100	15,000	9,800	6,700	8,700	9,200
Sulfides	10,000	760	120	J	--	--	--	--	--
Chemical Oxygen Demand	2,000,000	669,000	292,000	--	--	--	--	--	--
n-Hexane Extractable Material	200,000	33,600	25,200	--	--	--	--	--	--
Total Suspended Solids	500,000	5,260,000	161,000	117,000	131,000	254,000	ND	164,000	390,000
Phenol	20,000	120	J	24	J	--	--	--	--
Benzene	500	9	ND	--	--	--	--	--	--
Arsenic	5,000	15	8.3	J	--	--	--	--	--
Lead	5,000	5	1	J	--	--	--	--	--
<hr/>									
Parameter (Standard Units)	ETP Acceptance Criteria								
pH	6.0 - 9.0	6.6	6.0	6.5	6.2	6.0	6.4	6.2	6.4

ppb = parts per billion

ETP = Effluent Treatment Plant

ND = Not Detected

J = Laboratory Estimated Value

-- = parameter was not analyzed or was rejected for that sample

Bold indicates concentration above ETP acceptance criteria.